

William A. Isaacson (admitted *pro hac vice*)  
Melissa Felder (admitted *pro hac vice*)  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Ave. NW, Suite 800  
Washington, D.C. 20015  
Telephone: (202) 237-2727  
Facsimile: (202) 237-6131  
Email: wisaacson@bsfllp.com  
mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)  
Anne M. Nardacci (admitted *pro hac vice*)  
Christopher Fenlon (admitted *pro hac vice*)  
BOIES, SCHILLER & FLEXNER LLP  
10 North Pearl Street, 4th Floor  
Albany, NY 12207  
Telephone: (518) 434-0600  
Facsimile: (518) 434-0665  
Email: piovieno@bsfllp.com  
anardacci@bsfllp.com  
cfenlon@bsfllp.com

[Additional counsel listed in signature page]

Counsel for Plaintiffs MetroPCS Wireless, Inc.; Office Depot, Inc.; Interbond Corporation of America, Inc.; Schultze Agency Services, LLC; P.C. Richard & Son Long Island Corporation; MARTA Cooperative of America, Inc.; ABC Appliance, Inc.; Tech Data Corporation and Tech Data Product Management, Inc.; The AASI Creditor Liquidating Trust; CompuCom Systems, Inc.; and NECO Alliance LLC

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

CASE NO. M:07-md-01827-SI

MDL No. 1827

This Document Relates to:

*SB Liquidation Trust v. AU Optronics Corp., et al.*, 3:10-cv-05458-SI

*MetroPCS Wireless, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-00829-SI

*Office Depot, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-02225-SI

*Jaco Electronics, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-02495-SI

CASE NOS. 3:10-cv-05458-SI;  
3:11-cv-0829-SI; 3:11-cv-02225-SI;  
3:11-cv-02495-SI; 3:11-cv-03763-SI;  
3:11-cv-03856-SI; 3:11-cv-04119-SI;  
3:11-cv-05765-SI; 3:11-cv-05781-SI;  
3:11-cv-06241-SI; 3:12-cv-00335-SI;  
3:12-cv-01426-SI; 3:12-cv-02495-SI;  
3:10-cv-05625-SI; 3:10-cv-03205 SI;

**STIPULATION AND ~~[PROPOSED]~~  
ORDER SETTING REVISED TRACK 2  
DEADLINES**

1 *Interbond Corp. of America v. AU Optronics*  
2 *Corp., et al.*, 3:11-cv-03763-SI

3 *Schultze Agency Services, LLC, on behalf of*  
4 *Tweeter Opco, LLC and Tweeter Newco, LLC,*  
5 *v. AU Optronics Corp., et al.*,  
6 3:11-cv-03856-SI

7 *P.C. Richard & Son Long Island Corp., et al. v.*  
8 *AU Optronics Corp., et al.*, 3:11-cv-04119-SI

9 *Tech Data Corp., et al. v. AU Optronics Corp.,*  
10 *et al.*, 3:11-cv-05765-SI

11 *The AASI Creditor Liquidating Trust, by and*  
12 *through Kenneth A. Welt, Liquidating Trustee v.*  
13 *AU Optronics Corp., et al.*, 3:11-cv-05781-SI

14 *CompuCom Systems, Inc. v. AU Optronics Corp.,*  
15 *et al.*, 3:11-cv-06241-SI

16 *NECO Alliance LLC v. AU Optronics Corp., et*  
17 *al.*, 3:12-cv-01426-SI

18 *Rockwell Automation, Inc. v. AU Optronics*  
19 *Corp., et al.*, 3:12-cv-02495-SI

20 *Alfred H. Siegel, as Trustee of the Circuit City*  
21 *Stores, Inc. Liquidating Trust v. AU Optronics*  
22 *Corp., et al.*, 3:10-cv-05625-SI

23 *Tracfone Wireless, Inc. v. AU Optronics*  
24 *Corporation, et al.*, 3:10-cv-03205 SI

25  
26 Plaintiffs in the above-captioned cases (collectively, “Track 2 Cases”) and Defendants in  
27 the Track 2 Cases (respectively, “Plaintiffs” and “Defendants,” collectively, “Parties”) hereby  
28 stipulate as follows:

WHEREAS the Track 2 Cases have been proceeding with pretrial preparation in  
accordance with the Court’s Order dated June 12, 2013 (Dkt. No. 8076), and the deadline for  
service of opposition expert reports for Defendants in the Track 2 cases is presently September  
24, 2013;

WHEREAS, on June 13, 2013, Plaintiffs submitted reports from their experts in the Track  
2 Cases;

WHEREAS counsel for Plaintiffs and counsel for Defendants in the Track 2 cases have

met and conferred and determined that extending the deadline for Defendants' experts' opposition reports will enable depositions of Plaintiffs' experts to take place at a time more convenient for the Parties, their counsel, and Plaintiffs' experts;

WHEREAS counsel for Plaintiffs and counsel for Defendants in the Track 2 cases have met and conferred and determined that Plaintiffs and Defendants should each receive a one-month extension for submitting their opposition and reply expert reports, with the result that all other unexpired deadlines would be extended to preserve approximately the same number of days previously provided for briefing and hearings under the original schedule, as set forth below;

WHEREAS the following extensions for unexpired deadlines in the Track 2 cases will not prejudice any of the parties or the Court because trial dates have not been scheduled for any of these cases;

NOW THEREFORE, IT IS HEREBY STIPULATED between counsel for Plaintiffs and counsel for Defendants in the Track 2 cases, and subject to the concurrence of the Court, that the Track 2 cases, other than the *State of Oregon* case and the *Hewlett-Packard* case, will adopt the following Track 2 case schedule:

Event	Current Date (pursuant to June 12, 2013 Order)	Revised Date
Close of limited fact discovery unique to DAP and State AG cases	May 17, 2013 (this deadline previously has been amended in certain Track 2 cases)	Unchanged
Service of opening expert reports for plaintiffs	June 13, 2013	Unchanged
Service of underlying data and Code	June 19, 2013	Unchanged
Service of opposition expert Reports	September 24, 2013	October 24, 2013
Service of underlying data and Code	September 30, 2013	October 30, 2013
Plaintiffs and Defendants to Serve Proposed List of Summary Judgment Motions (Copies to be Provided to the Court)	October 22, 2013	November 22, 2013

1	Plaintiffs and Defendants to Meet and Confer	October 25-November 11,	November 25-
2	Over Proposed List of Summary Judgment	2013	December 11, 2013
3	Motions and Schedule for Same		
4	Plaintiffs and Defendants to File with the	November 13, 2013	December 12, 2013
5	Court Joint List of Proposed Summary		
6	Judgment Motions and Proposed Schedule for		
7	Summary Judgment Filings		
8	Service of reply expert reports	November 26, 2013	January 27, 2014
9	Service of underlying data and Code	December 4, 2013	February 4, 2014
10	Service of sur-rebuttal expert reports on	February 3, 2014	April 9, 2014
11	downstream pass-on		
12	Service of underlying data and Code	February 9, 2014	April 15, 2014
13	Close of expert discovery	March 6, 2014	May 20, 2014
14	Last Day to File Supplemental List of		
15	Proposed Summary Judgment Motions Based	March 6, 2014	March 27, 2014
16	Upon New Information or Issues Raised in the		
17	Reply Expert Reports		
18	Last day to file dispositive Motions	April 4, 2014	April 25, 2014
19	Last day to file oppositions to dispositive	May 16, 2014	June 6, 2014
20	motions		
21	Last day to file reply briefs in support of	June 27, 2014	July 18, 2014
22	dispositive motions		
23	Last day for hearing dispositive motions	July 11, 2014	August 1, 2014

24 Dated: August 23, 2013

25 Respectfully submitted,

26 By: /s/ Philip J. Iovieno  
 27 William Isaacson (admitted *pro hac vice*)  
 28 Melissa Felder (admitted *pro hac vice*)  
 BOIES, SCHILLER & FLEXNER LLP  
 5301 Wisconsin Avenue NW, Suite 800  
 Washington, DC 20015  
 Telephone: (202) 237-2727  
 Facsimile: (202) 237-6131  
 Email: wisaacson@bsfllp.com  
 mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)  
Anne M. Nardacci (admitted *pro hac vice*)  
Christopher Fenlon (admitted *pro hac vice*)  
BOIES, SCHILLER & FLEXNER LLP  
10 North Pearl Street, 4th Floor  
Albany, NY 12207  
Telephone: (518) 434-0600  
Facsimile: (518) 434-0665  
Email: piovieno@bsflp.com  
anardacci@bsflp.com  
cfenlon@bsflp.com

Stuart H. Singer (admitted *pro hac vice*)  
Meredith Schultz (admitted *pro hac vice*)  
BOIES, SCHILLER, & FLEXNER LLP  
401 East Las Olas Boulevard, Suite 1200  
Fort Lauderdale, FL 33301  
Telephone: (954) 356-0011  
Facsimile: (954) 356-0022  
Email: ssinger@bsflp.com  
mschultz@bsflp.com

*Attorneys for Plaintiffs MetroPCS Wireless, Inc.;  
Office Depot, Inc.; Interbond Corp. of America;  
Schultze Agency Services, LLC; P.C. Richard & Son  
Long Island Corporation; MARTA Cooperative of  
America, Inc.; ABC Appliance Inc.; Tech Data Corp.  
and Tech Data Product Management, Inc.; The AASI  
Creditor Liquidating Trust; CompuCom Systems, Inc.;  
and NECO Alliance LLC*

By: /s/ Robert W. Turken  
Robert W. Turken  
Mitchell E. Widon  
Scott N. Wagner  
BILZIN SUMBERG BAENA PRICE & AXELROD  
LLP  
1450 Rickell Avenue, Suite 2300  
Miami, FL 33131-3456  
Telephone: (305) 374-7580  
Facsimile: (305) 374-7593  
Email: rturken@bilzin.com  
mwidom@bilzin.com  
swagner@bilzin.com

*Attorneys for Plaintiffs Tech Data Corp. and Tech  
Data Product Management, Inc. and The AASI  
Creditor Liquidating Trust*

By: /s/ H. Lee Godfrey

H. Lee Godfrey  
Kenneth S. Marks  
Jonathan J. Ross  
Johnny W. Carter  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
Email: lgodfrey@susmangodfrey.com  
kmarks@susmangodfrey.com  
jross@susmangodfrey.com  
jcarter@susmangodfrey.com

Parker C. Folse III  
Rachel S. Black  
Jordan Connors  
SUSMAN GODFREY L.L.P.  
1201 Third Avenue, Suite 3800  
Seattle, WA 98101-3000  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
Email: pfolse@susmangodfrey.com  
rblack@susmangodfrey.com  
jconnors@susmangodfrey.com

*Attorneys for Plaintiff Alfred H. Siegel, as Trustee of  
the Circuit City Stores, Inc. Liquidating Trust*

1 By: /s/ Marc M. Seltzer  
2 Marc M. Seltzer (54534)  
3 Steven G. Sklaver (237612)  
4 SUSMAN GODFREY LLP  
5 1901 Avenue of the Stars, Suite 950  
6 Los Angeles, CA 90067-6029  
7 Telephone: (310) 789-3100  
8 Facsimile: (310) 789-3150  
9 Email: mseltzer@susmangodfrey.com  
10 ssklaver@susmangodfrey.com

11 Erica W. Harris  
12 SUSMAN GODFREY LLP  
13 1000 Louisiana, Suite 5100  
14 Houston, TX 77002-5096  
15 Telephone: (713) 651-9366  
16 Facsimile: (713) 654-6666  
17 Email: eharris@susmangodfrey.com

18 *Attorneys for SB Liquidation Trust*

19 By: /s/ James B. Baldinger  
20 James B. Baldinger  
21 Florida Bar No.: 869899  
22 jbbaldinger@carltonfields.com  
23 Robert L. Ciotti  
24 Florida Bar No.: 333141  
25 rciotti@carltonfields.com  
26 David B. Esau  
27 Florida Bar No.: 650331  
28 desau@carltonfields.com  
CARLTON FIELDS, P.A.  
CityPlace Tower – Suite 1200  
525 Okeechobee Boulevard  
West Palm Beach, Florida 33401  
Telephone: (561) 659-7070  
Facsimile: (561) 659-7368

*Counsel for TracFone Wireless, Inc.*

By: /s/ Jerome A. Murphy

Jeffrey H. Howard (*pro hac vice*)  
Jerome A. Murphy (*pro hac vice*)  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, DC 20004  
Telephone: (202) 624-2500  
Facsimile: (202) 628-5116  
Email: jhoward@crowell.com  
jmurphy@crowell.com

Jason C. Murray (CA Bar No. 169806)  
Janet I. Levine (CA Bar No. 94255)  
Joshua C. Stokes (CA Bar No. 220214)  
CROWELL & MORING LLP  
515 South Flower Street, 40th Floor  
Los Angeles, CA 90071  
Telephone: (213) 622-4750  
Facsimile: (213) 622-2690  
Email: jmurray@crowell.com  
jlevine@crowell.com  
jstokes@crowell.com

Kenneth L. Adams (*pro hac vice*)  
R. Bruce Holcomb (*pro hac vice*)  
Christopher T. Leonardo (*pro hac vice*)  
ADAMS HOLCOMB LLP  
1875 Eye Street NW  
Washington, DC 20006  
Telephone: (202) 580-8822  
Facsimile: (202) 580-8821  
Email: adams@adamsholcomb.com  
holcomb@adamsholcomb.com  
leonardo@adamsholcomb.com

*Attorneys for Plaintiffs Jaco Electronics, Inc. and  
Rockwell Automation, Inc., and Plaintiffs' Liaison  
Counsel*



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

\*By: /s/ Lee F. Berger  
Holly A. House (State Bar No. 136045)  
Kevin C. McCann (State Bar No. 120874)  
Lee F. Berger (State Bar No. 222756)  
Sean Unger (State Bar No. 231694)  
PAUL HASTINGS LLP  
55 Second Street  
Twenty-Fourth Floor  
San Francisco, CA 94105  
Telephone: (415) 856-7000  
Facsimile: (415) 856-7100  
Email: kevinmccann@paulhastings.com  
hollyhouse@paulhastings.com  
leeberger@paulhastings.com  
seanunger@paulhastings.com

Brad D. Brian (State Bar No. 079001)  
Jerome C. Roth (State Bar No. 159483)  
MUNGER, TOLLES & OLSON LLP  
355 South Grand Avenue  
Los Angeles, CA 90071-1560  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702  
Email: Brad.Brian@mto.com

*Attorneys for Defendants LG Display Co., Ltd. and LG Display America, Inc.*

By: /s/ Stephen P. Freccero  
Melvin R. Goldman (SBN 34097)  
Stephen P. Freccero (SBN 131093)  
Derek F. Foran (SBN 224569)  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105  
Telephone: (415) 268-7000  
Facsimile: (415) 268-7522  
Email: mgoldman@mofo.com  
sfreccero@mofo.com  
dforan@mofo.com

*Attorneys for Defendants Epson Imaging Devices Corporation and Epson Electronics America, Inc.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By: /s/ Carl L. Blumenstein  
Christopher A. Nedeau (State Bar No. 81297)  
Carl L. Blumenstein (State Bar No. 124158)  
Farschad Farzan (State Bar No. 215194)  
NOSSAMAN LLP  
50 California Street, 34th Floor  
San Francisco, CA 94111  
Telephone: (415) 398-3600  
Facsimile: (415) 398-2438  
Email: cnedeau@nossaman.com  
cblumenstein@nossaman.com  
ffarzan@nossaman.com

*Attorneys for Defendants AU Optronics Corporation  
and AU Optronics Corporation America*

By: /s/ Christopher M. Curran  
Christopher M. Curran (*pro hac vice*)  
Martin M. Toto (*pro hac vice*)  
John H. Chung (*pro hac vice*)  
WHITE & CASE LLP  
1155 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 819-8200  
Facsimile: (212) 354-8113  
Email: ccurran@whitecase.com  
mtoto@whitecase.com  
jchung@whitecase.com

*Attorneys for Toshiba Corporation, Toshiba Mobile  
Display Co., Ltd., Toshiba America Electronic  
Components, Inc. and Toshiba America Information  
Systems, Inc.*

1 By: /s/ Neal A. Potischman  
2 Neal A. Potischman (SBN 254862)  
3 neal.potischman@davispolk.com  
4 DAVIS POLK & WARDWELL LLP  
5 1600 El Camino Real  
6 Menlo Park, California 94025  
7 Telephone: (650) 752-2000  
8 Facsimile: (650) 752-2111

9 *Counsel for Chi Mei Optoelectronics Corporation*  
10 *(n/k/a Innolux Corporation), CMO Japan Co., Ltd.,*  
11 *and Chi Mei Optoelectronics USA, Inc. for the Office*  
12 *Depot, Inc., Interbond Corp. of America, Schultze*  
13 *Agency Services, LLC, P.C. Richard & Son Long*  
14 *Island Corp., et al., Tech Data Corp., et al., The AASI*  
15 *Creditor Liquidating Trust, CompuCom Systems, Inc.,*  
16 *and NECO Alliance LLC Actions Only*

17 /s/ Michael R. Scott  
18 Michael R. Scott (pro hac vice)  
19 mrs@hcmp.com  
20 Michael J. Ewart (pro hac vice)  
21 mje@hcmp.com  
22 HILLIS CLARK MARTIN & PETERSON P.S.  
23 1221 Second Avenue, Suite 500  
24 Seattle, WA 98101-2925  
25 Telephone: (206) 623-1745  
26 Facsimile: (206) 623-7789

27 *Counsel for Chi Mei Optoelectronics Corporation*  
28 *(n/k/a Innolux Corporation), CMO Japan Co., Ltd.,*  
*and Chi Mei Optoelectronics USA, Inc. for the*  
*MetroPCS Wireless, Inc. Action Only*

19 By: /s/ William S. Farmer  
20 William S. Farmer (SBN 46694)  
21 David C. Brownstein (SBN 141929)  
22 Jacob P. Alpren (SBN 235713)  
23 Farmer Brownstein Jaeger LLP  
24 235 Pine Street, Suite 1300  
25 San Francisco, CA 94104  
26 Telephone: (415) 795-2050  
27 Email: wfarmer@fbj-law.com  
28 dbrownstein@fbj-law.com  
jalpren@fbj-law.com

*Counsel for Chunghwa Picture Tubes, Ltd. in the*  
*MetroPCS Wireless Actions Only*

1 By: /s/ Rachel S. Brass  
2 Rachel S. Brass (SBN 219301)  
3 Joel S. Sanders (SBN 107234)  
4 Austin V. Schwing (SBN 211696)  
5 GIBSON, DUNN & CRUTCHER LLP  
6 555 Mission Street, Suite 3000  
7 San Francisco, California 94105  
8 (415) 393-8200 / (415) 393-8306  
9 *jsanders@gibsondunn.com*  
10 *rbrass@gibsondunn.com*

*Attorneys for Defendants Chunghwa Picture Tubes,  
Ltd. in the SB Trust, Office Depot, Jaco Electronics,  
Interbond, Schultze Agency Services, PC Richard,  
Tech Data, AASI Creditor Liquidating Trust,  
CompuCom, Viewsonic, and NECO Alliance Actions  
Only*

11 By: /s/ Robert E. Freitas  
12 Robert E. Freitas (SBN 80948)  
13 Jason S. Angell (SBN 221607)  
14 Jessica N. Leal (SBN 267232)  
15 FREITAS TSENG & KAUFMAN LLP  
16 100 Marine Parkway, Suite 200  
17 Redwood Shores, CA 94065  
18 Telephone: (650) 593-6300  
19 Facsimile: (650) 593-6301  
20 Email: *rfreitas@ftklaw.com*  
21 *jangell@ftklaw.com*  
22 *jleal@ftklaw.com*

*Attorneys for Defendant HannStar Display  
Corporation*

23 By: /s/ Jacob R. Sorensen  
24 Jacob R. Sorensen (SBN 209134)  
25 John M. Grenfell (SBN 88500)  
26 Fusae Nara (*pro hac vice*)  
27 Andrew D. Lanphere (SBN 191479)  
28 PILLSBURY WINTHROP SHAW PITTMAN LLP  
Four Embarcadero Center, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 983-1000  
Facsimile: (415) 983-1200  
Email: *john.grenfell@pillsburylaw.com*  
*jake.sorensen@pillsburylaw.com*  
*fusae.nara@pillsburylaw.com*  
*andrew.lanphere@pillsburylaw.com*

1 By: /s/ Michael W. Scarborough  
2 Michael W. Scarborough (SBN 203524)  
3 SHEPPARD MULLIN RICHTER & HAMPTON  
4 Four Embarcadero Center, 17th Floor  
5 San Francisco, CA 94111  
6 Telephone: (415) 434-9100  
7 Facsimile: (415) 434-3947  
8 Email: mscarborough@sheppardmullin.com

*Attorneys for Defendants Samsung SDI America, Inc.  
and Samsung SDI Co., Ltd.*

9 By: /s/ Kent M. Roger  
10 Kent M. Roger (Bar No. 95987)  
11 MORGAN LEWIS & BOCKIUS LLP  
12 One Market, Spear Street Tower  
13 San Francisco, CA 94105-1126  
14 Telephone: (415) 442-1000  
15 Facsimile: (415) 442-1001  
16 Email: kroger@morganlewis.com

*Attorneys for Defendants Hitachi, Ltd., Hitachi  
Displays, Ltd. (n/k/a Japan Display Inc.) and Hitachi  
Electronic Devices (USA), Inc.*

17 By: /s/ Stephen Holbrook Sutro  
18 George Dominic Niespolo  
19 Stephen Holbrook Sutro  
20 DUANE MORRIS LLP  
21 One Market, Spear Tower, Suite 2200  
22 San Francisco, CA 94105  
23 Telephone: (415) 957-3010  
24 Facsimile: (415) 957-3001  
25 Email: gdniespolo@duanemorris.com  
26 shsutro@duanemorris.com

*Attorneys for NEC Corporation, NEC LCD Technologies,  
Ltd., and Renesas Electronics America, Inc.*

27  
28  
\*Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this  
document has been obtained from each of the above signatories.

1 **IT IS SO ORDERED.**

2  
3 Dated: 8/30/13



4 Hon. Susan Illston  
5 United States District Judge  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28